

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
*****First Amended*****

IN RE:

CHAPTER 13
PROCEEDING

JEREMY E BROWN AND
TONYA L. BROWN

DEBTORS.

CASE NO. 11-50326

1. Debtor(s) shall pay to the Trustee out of future income the sum of \$400.00 every month for a period of sixty (60) months or all of the Debtor's disposable income pursuant to 11 U.S.C. §1322(a)(1) and §1325(b)(2). Said payments shall commence within thirty (30) days from the filing of the plan pursuant to 11 U.S.C. §1326(a)(1).

2. All claims entitled to priority under 11 U.S.C. §507 shall be paid in full in deferred cash payments unless a holder of a particular claim agrees to a different treatment. In addition to the costs of administration, which are to be paid in accordance with the standing procedure of this Court, the following priority claims shall be paid in full prior to the payment of any other claims unless a different treatment is specified herein: The Debtor's student loan shall be paid as an unsecured creditor and any balance owing after the completion of the plan shall remain an obligation of the Debtor.

<u>Creditor</u>	<u>Amount</u>
1. Cca Municipal Tax (Wadsworth City Tax)	\$500.00
2. Cca Municipal Tax(Norton City Tax)	\$500.00

3. The following secured creditors shall be paid current monthly payments directly (outside) by Debtors with arrears, if any, to be paid by the Trustee:

<u>Creditor</u>	<u>Arrearage</u>	<u>Interest rate</u>	<u>Fixed payment</u>
First Franklin Loan Services nka Bank of America, N.A.	\$3,678.31	contract	
Freedom Road Financial (2007 Suzuki Eiger recreational)	\$0.00	contract	

4. The following creditors shall be paid by the Trustee. Each holds a secured claim to the extent of the value of the collateral therefore as indicated below and an unsecured claim for the balance, if any:

<u>Creditor</u>	<u>Secured value</u>	<u>Interest rate</u>	<u>Fixed payment</u>
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None in this plan

A holder of a secured claim shall retain a lien securing such claim until the amount for which the claim is allowed as secured is paid in full pursuant to 11 U.S.C. §§1325(a)(5)(B)(I) and 1327(c).

5. Executory contracts shall be treated as follows:

None in this plan

6. Creditors holding unsecured claims shall be paid 55% of the amount owing on a pro-rata basis. No interest accruing after the filing of the petition shall be allowed.

7. This Plan shall allow for the payment of all or any part of any claim allowed under 11 U.S.C. §1305.

8. The length of this Plan is estimated to be sixty (60) months. This Plan may be extended beyond its stated term by not to exceed a total of sixty (60) months, in order to carry out the provisions hereof without further application or notice pursuant to 11 U.S.C. §1322(c).

9. The following provisions shall further apply:

- A. Administrative, priority and secured creditors shall be paid before unsecured creditors;
- B. All defaults shall be cured under the Plan;
- C. All secured creditors shall release and satisfy their liens upon payment in full of the secured value of their collateral;
- D. Debtors counsel fees in Chapter 13 cases filed in Akron, Ohio shall be deemed an administrative expense of the bankruptcy estate pursuant to 11 U.S.C. §503(b). Upon confirmation of the plan, provided sufficient funds have been paid into the plan, the Chapter 13 Trustee shall commence payment of attorney fees pursuant to 11 U.S.C. §507(a)(1) and 11 U.S.C. §1326(b)(1), subject to Administrative Order No. 04-01. Debtors counsel shall remain counsel of record and provide representation on behalf of the Debtors until completion or dismissal of this case, unless said representation has been excused by the court. Failure to attend to such representation may result in an order requiring disgorgement of fees.

Statement of Plan Amendment(s)

The Plan is amended in paragraph 3 to show an arrearage owed to secured creditor Bank of America, N.A.,

/s/ Jeremy E Brown

/s/Tonya L. Brown

Date: October 10, 2011

/s/ Chris G. Manos
Chris G. Manos/#0023956
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Plan will be served by regular United States mail on all creditors listed on the Debtor's schedules within ten (10) days of the filing of the Plan with the United States Bankruptcy Court.

/s/ Chris G. Manos
Chris G. Manos